



Signed and Filed: October 14, 2021

**KELLER BENVENUTTI KIM LLP**

Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

A handwritten signature in cursive script, reading "Dennis Montali", is written over a horizontal line.

**DENNIS MONTALI**  
U.S. Bankruptcy Judge

*Attorneys for Debtors and Reorganized  
Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**ORDER APPROVING STIPULATION  
MODIFYING PLAN INJUNCTION  
(PETER A. LOPEZ AND MICHAEL  
A. LOPEZ, JR.)**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

1 The Court having considered the *Stipulation Modifying Plan Injunction (Peter A. Lopez and*  
2 *Michael A. Lopez, Jr.)*, dated October 13, 2021 [Dkt. No. 11412] (the “**Stipulation**”),<sup>1</sup> entered into  
3 by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
4 reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan (as defined  
5 below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on  
6 the one hand, and Peter A. Lopez and Michael A. Lopez Jr. (collectively, “**Plaintiffs**,” and, together  
7 with the Debtors and Reorganized Debtors, the “**Parties**”), on behalf of themselves and all others  
8 similarly situated, on the other hand; and pursuant to such Stipulation and agreement of the Parties,  
9 and good cause appearing,

10 IT IS HEREBY ORDERED THAT:

- 11 1. The Stipulation is approved.
- 12 2. Upon the date of the entry of this Order, the Plan Injunction shall be modified, to the  
13 extent necessary, solely to permit the Parties to seek final approval of the Class Action Settlement  
14 Agreement in the State Court Action and to take all actions necessary in connection with obtaining  
15 such approval.
- 16 3. Upon the date of the entry of this Order, the Stipulation shall be deemed an  
17 objection by the Reorganized Debtors to the Proof of Claim, and the Proof of Claim shall be  
18 considered a Disputed Claim. The Proof of Claim shall be deemed an Allowed Claim,  
19 recoverable solely as a Utility General Unsecured Claim in accordance with the Plan and through  
20 the claims reconciliation process in these Chapter 11 Cases, on the earlier of the date on which an  
21 order and judgment of the State Court approving the Class Action Settlement Agreement on a  
22 final basis in the State Court become final and non-appealable or all appeals from such judgment  
23 have been concluded.
- 24 4. Nothing in the Stipulation or this Order is intended, nor shall it be construed, to be:
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27 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to  
28 them in the Stipulation.

- 1           a.       a waiver by the Reorganized Debtors or any other party in interest, of any  
2                   right to object to the Proof of Claim or any portion of the underlying claim in  
3                   the event the Class Action Settlement Agreement is not approved on a final  
4                   basis in the State Court Action, or  
5           b.       a waiver by Plaintiffs of their rights to oppose any asserted challenge to any  
6                   Proof of Claim, or  
7           c.       a waiver by any Party of any claim or defense in the State Court Action.

8           5.       For purposes of conduct of the State Court Action, the Parties through their counsel  
9                   may enter into other stipulations in or with regard to the State Court Action, including without  
10                  limitation stipulations relating to discovery matters, motion practice, the form or presentation of  
11                  evidence, or the conduct of the trial. Such stipulations shall be enforceable by the State Court (not  
12                  the Bankruptcy Court) in accordance with statutes, rules and procedures applicable to the State Court  
13                  Action.

14           6.       The Stipulation shall be binding on the Parties and each of their successors in interest.

15           7.       The Stipulation shall constitute the entire agreement and understanding of the Parties  
16                   relating to the subject matter thereof and supersedes all prior agreements and understandings relating  
17                   to the subject matter thereof.

18           8.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
19                   controversies arising from the Stipulation or this Order.

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22       APPROVED AS TO FORM AND CONTENT:

23       Dated: October 13, 2021

24       COHELAN KHOURY & SINGER

25       /s/ Isam C. Khoury  
26       Isam C. Khoury

27       Attorneys for Peter A. Lopez and Michael A. Lopez Jr.  
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